ROY F. WESTON, INC.

RIVER ROUGE OIL SPILL, DEARBORN, MICHIGAN
APRIL 2002
SITE INSPECTION REPORT FOR
SYBILL, INC.
DETROIT, WAYNE COUNTY, MICHIGAN

WESTON
MANAGERS

RIVER ROUGE OIL SPILL, DEARBORN, MICHIGAN
APRIL 2002
SITE INSPECTION REPORT FOR
SYBILL, INC.
DETROIT, WAYNE COUNTY, MICHIGAN

Prepared for

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Emergency Response Branch
Region V
77 West Jackson Street
Chicago, Illinois 60604

Prepared by

Roy F. Weston, Inc.
750 East Bunker Court, Suite 500
Vernon Hills, Illinois 60061

Date Prepared	27 August 2002
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27 August 2002

Prepared by _____ Date 8/26/02
Stephen A. Wolfe
START Member

Reviewed & Approved by _____ Date 8/26/02
John W. Thorsen, P.E.
START Deputy Program Manager

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SECTION 1
INTRODUCTION

On 10 April 2002, the Roy F. Weston, Inc., (WESTON®) Superfund Technical Assessment and Response Team (START) was directed by the United States Environmental Protection Agency (U.S. EPA) to assist U.S. EPA On-Scene Coordinator (OSC) Jason El-Zein in conducting emergency response activities at the River Rouge Oil Spill Site in Dearborn and Detroit, Wayne County, Michigan. The emergency response activities were conducted under Technical Direction Document (TDD) number S05-0204-010.

As a part of the ongoing investigation into the source of the oil spilled into the River Rouge in April 2002, numerous facilities in Dearborn and Detroit, Michigan, were inspected, and each facility's Spill Prevention Countermeasures and Control (SPCC) Plan was reviewed. During site inspection activities, samples were collected from sewers, tanks, and facility sumps and were submitted for chemical analysis at the U.S. EPA Emergency Response Team (ERT)-contracted laboratory and at WESTON-subcontracted laboratories. The majority of samples START collected were split with the U.S. Coast Guard (USCG) and analyzed by the Coast Guard Oil Identification Laboratory (COIL). Results from USCG sampling are provided in the River Rouge Spill Response Site Files. Sample Plans, Sample Quality Assurance Project Plans (QAPPs), and ERT and WESTON-subcontracted laboratory QAPPs are provided in the River Rouge Spill Response Site Files. Potential sources of the spilled oil were identified as those facilities that handled the type and quantity of oil found in the river and that had a potential migration or discharge pathway to the suspected spill or release area on the River Rouge.

The objective of this site inspection was to gather facility-specific information to determine if Sybill, Inc. (Sybill) is a potentially responsible party (PRP) to the release that occurred on the River Rouge and Detroit River in April 2002.

Specific tasks of the site inspection were as follows:

- Compile background information, including analytical data from samples START and the USCG collected, regarding the quantity and kind of oily wastes or types of products present at the facility;
- Conduct an on-site reconnaissance and document existing volumes and types of oils and oily wastes at the site;
- Collect samples to determine if the oils and oily wastes at this site match the oils collected from the River Rouge;
- Evaluate the potential for releases of oily materials or products from the site and their potential off-site migration pathways;
- Conduct a review of the facility's SPCC Plan and determine if the facility is environmentally compliant or is a risk for spillage;
- Prepare a Site Inspection Report that documents the findings.

This Site Inspection Report is part of the River Rouge Spill Response Site File and is organized into the following sections:

Section 1 - Introduction - The introduction provides a brief description of the objective and scope of the assessment activities.

Section 2 - Site Background - The site background provides a site description and a compressed site history of historical ownership, work activities, and operations at the site.

Section 3 - Environmental Investigation Activities - This section includes site observations and sampling, an SPCC Plan review discussion, and an engineering evaluation of sewers and potential pathways for discharge to the River Rouge.

Section 4 - Discussion of Potential Threats - A summary of potential threats to human health and the environment is offered.

Section 5- Findings and Conclusions - This section summarizes the findings of the investigation activities.

SECTION 2

SITE BACKGROUND

2.1 SITE DESCRIPTION

The Sybill facility is located at 111 Military Road, Detroit, Wayne County, Michigan (Attachments A-1, Topographic Site Location Map and A-2, Aerial Site Location Map). The geographical coordinates for the area of the site included in this investigation are latitude 42°18.300' N and longitude 83°06.000' W. The site is located in a mixed industrial and residential area. Sybill is comprised of an approximately 15-acre parcel of land split by Military Road.

Site reconnaissance and file review indicated that Sybill is comprised of two buildings, a water tower, two large areas for parking, and 26 aboveground storage tanks (ASTs) (5 outdoor and 21 indoor) with a combined storage capacity of approximately 1,682,000 gallons (Attachment B, Facility Layout Map). In addition, approximately 20 tanker/trailer trucks were on-site along the northern and eastern property lines. The trucks in the northern portion of the facility were parked within a containment area.

2.2 SITE HISTORY

On 10 May 2002, Mr. Jeff Roberts, Director of Engineering Labs, Inc. (EL), provided historical information regarding Sybill. The Sybill facility was at one time a water treatment facility for the City of Detroit. Later, Sybill used the facility as a waste oil storage facility and filled the on-site ASTs and clarifiers

for the water treatment plant with oil and waste products. Once the facility's storage capacity was reached, Sybill filed for bankruptcy and abandoned the facility.

2.3 HISTORICAL ASSESSMENT AND INVESTIGATION ACTIVITIES

Sybill, owned and operated by Mr. William Madius, received and processed waste oil and water from local industry. Due to various violations and difficulties with the Detroit Water and Sewerage Department (DWSD) and Michigan Department of Environmental Quality (MDEQ), the permits for the facility were revoked. Utility services were terminated in June 2001. Sybill, however, continued to receive waste oil after the utilities had been disconnected and stockpiled waste in all of the available on-site containers and tanks until the end of August 2001.

General Motors, Inc. (GM) reportedly contributed 70% of the waste to the site during its operation. GM contracted EL to perform remedial activities at the site after the facility was abandoned. Mr. Roberts estimated that the facility was storing approximately 2 million gallons of waste oil and that after GM's removal activities were completed, approximately 400,000 gallons of material remained on-site.

SECTION 3

ENVIRONMENTAL INVESTIGATION ACTIVITIES

3.1 SITE OBSERVATIONS AND SAMPLING

On 10 May 2002, OSC Ross Powers and Civil Investigator Joe Kawecki (U.S. EPA); START members Mr. TJ McFarland, Ms. Sarah Meyer, Mr. Christopher Greene, Mr. Jose DeLaPortilla, and Mr. Michael Browning (WESTON); and USCG personnel met with Mr. Jeff Roberts (EL) to inspect the Sybill facility. Select photo documentation of the site inspection activities and a Select Photo Documentation Map are presented in Attachments C and D, respectively. A Sample Location Map is provided in Attachment E, and a summary of sample results is presented in Attachment F.

3.1.1 ASTs Nos. 1 and 2

Two 250,000-gallon ASTs (Nos. 1 and 2) were located in the parking area to the northeast of the facility across Military Road (Attachment C, Photo 4). These ASTs are within a concrete secondary containment with a concrete floor. The secondary containment for AST Nos. 1 and 2 held approximately 3 inches of oily water and sludge (Attachment C, Photos 9 and 36). AST No. 1, the northernmost tank, was mostly empty; however, it did contain approximately 6 feet of sludge and 6 inches of oily material. A sample (ROS-CG-152) of what appeared to be a thick, dark gray to black, sludgy oil mixture was collected.

Because EL personnel informed START that AST No. 2 contained animal fats and tallow, it was not

initially sampled on 10 May 2002,. On 13 May 2002, however, START did inspect the tank and found an approximately 6-foot layer of oil on top of the tallow. The sample of the material (ROS-CG-158) had a distinct odor of decay and was black/brown in appearance. In addition, AST Nos. 1 and 2 were not secured to prevent access to the interior of the tank or to the tank's valving.

3.1.2 Pump House

Overhead piping from the facility crosses Military Road and enters a pump house, which showed evidence of trespassing. A gate next to the pump house had been forced open in the past, allowing free access to this portion of the facility (Attachment C, Photo 58). The door to the building itself had been pried open (Attachment C, Photo 53), and another exterior door to the pump room of the pump house had also been pried open.

START noted several drums labeled sodium hypochlorite solution and 35 % hydrogen peroxide solution located in and around the pump house (Attachment C, photos 84, 85, and 87). A drum labeled 35% hydrogen peroxide was located next to the pump in the pump room. In addition, the pump house's floor was covered with several inches of oily sludge (Attachment C, Photo 55). A manhole was located inside the building; however, due to the sludge on the floor and the piping, access to this manhole was restricted (Attachment C, Photo 54). During the site inspection, the piping in the pump house was discharging small amounts of oil onto the floor. Furthermore, wiring to the pump house had been cut and partially removed.

3.1.3 Box Trailers

Several box trailers and one abandoned tanker were observed in the parking area adjacent to AST Nos. 1 and 2. The tanker was tipped on its nose and was leaking oil. During the site inspection, START observed this oil pooling in the immediate vicinity of the tanker. An approximately 20 by 50-foot area had been stained by the leaking oil (Attachment C, Photos 22 and 26). Further inspection of the tanker revealed that it contained approximately 50 to 100 gallons of oil. The U.S. EPA notified EL of the incident and coordinated response activities to be initiated on 11 May 2002.

On 13 May 2002, START returned to the site to perform additional sampling and to document the remedial actions undertaken for mitigating the oil the tanker released. Absorbent material had been placed on portions of the pooling oil, and a small amount of absorbent material had been placed in a 95-gallon over pack. Pooling oil was still present, however, around the tanker, and the valve that had allowed the oil to escape had not been plugged.

3.1.4 Office Building

The two-story office building, located at the southeastern portion of the property, showed signs of forcible entry on the door. The building houses four 5,000-gallon ASTs, two on the first floor and two on the second floor. All of the ASTs appeared to be empty. The first floor of the building contains a general storage area, two ASTs, and several gas cylinders labeled hydrogen, nitrogen, and oxygen. These cylinders were free standing and not secured (Attachment C, Photo 48).

The second floor of the office building was comprised of an abandoned lab, office space, chemical and sample storage and two ASTs. Some of the material stored in the office area was labeled as polychlorinated biphenyls (PCBs) and flammable (Attachment C, Photos 49 and 81). No samples were collected from this building.

3.1.5 ASTs Nos. 3, 4, and 5

Between the two buildings on the southern portion of the facility were two 350,000-gallon clarifiers (and inbound material buffer) and one 180,000-gallon clarifier, which were used to store oil (Attachment C, Photo 5). These ASTs (Nos. 3, 4, and 5) all contained approximately 6 inches of oil. Samples ROS-CG-153, ROS-CG-154, and ROS-CG-155 were taken from each of the three ASTs, respectively. These samples were brown to black in color and did not have a distinct odor. The access points to these ASTs were open. The concrete secondary containment around the tanks contained approximately two inches of water with oil floating on top of it (Attachment C, Photos 39 and 40). In addition, open pipes were located in the wall of the secondary containment.

3.1.6 Process Building

At the southwest portion of the site, a processing building containing a stabilization tank, oil/water separator tank, and approximately 12 ASTs of varying capacity were present (Attachment C, Photos 6, 41, and 42). The floor of this building had standing water, oil, and sludge around the storage and processing tanks. The ceiling of this building was in disrepair and in danger of collapse.

In front of the process building's large roll-up doors, START discovered a Toledo Scale set in the floor. The vault for this scale had been used to store waste sludge and oil and was at full capacity at the time of START's inspection. The vault was sampled from two access points on 13 May 2002. The sample taken from the eastern side of the vault (ROS-CG-159) contained mostly sludge (Attachment C, Photo 13); the sample (ROS-CG-160) from the western side of the vault contained water with oil on top (Attachment C, Photo 14). In addition, a drum rack holding several drums was observed adjacent to the vaulted scale. The drums contained unknown liquids, and the labels on the drums were not legible. White crystals had formed around the bung of one of the drums (Attachment C, Photo 15).

3.1.7 Boiler House

Attached to the rear of the process building is a boiler/power house, which showed evidence of trespassing through an open window. Two large coal-fired boilers are located in one section of the structure, and two smaller boilers are located in another section. The ash pit for the large boilers was estimated to be 5,600 gallons and contained a mixture of water and oil (Attachment C, Photo 17). The sample collected from the ash pit (ROS-CG-161), located at the southeastern corner of the building, consisted of an oil/water mixture. In addition, several drums containing unknown liquids were located in the vicinity of the ash pit (Attachment C, Photo 16). One of the drums was labeled 35% hydrogen peroxide and had crystals around the bung. The other drums were open. The area where the smaller boilers are located contains several propane cylinders, numerous hydrogen cylinders, and drums of crystalized powders.

3.1.8 Northern Box Trailers

Adjacent to the buildings is the parking lot, which contained a box trailer full of drums, a 20-yard roll-off box with suspected petroleum-contaminated dirt, and eight tanker trailers of varying capacity. During the site inspection, START observed an unsecured gated entrance along the west edge of the western portion of the facility (Attachment C, Photo 68). The box trailer contained approximately 50 drums of undetermined contents. The eight tankers were parked on a curbed, concrete drip pad (Attachment C, Photo 66). One of the tankers had released approximately 100 gallons of oil. This oil flowed down gradient to a storm water discharge point. The grated manhole was stained with oil and had small amounts of oil floating on the surface of the water (Attachment C, Photo 70).

START then inspected a manhole at the western border of the facility. Upon removing of the manhole cover, air monitoring with a MultiRae indicated the presence of an explosive atmosphere (an elevated lower explosive limit reading). A second reading confirmed the presence of a potentially explosive atmosphere. As no odor was associated with the manhole, START concluded that the explosive gas present may be methane; therefore, the manhole was allowed to vent before inspection. Upon inspection, no unusual observations were noted.

3.2 SPCC PLAN REVIEW

Because the Sybill facility is abandoned and no SPCC Plan was available, an SPCC Plan review was not conducted for this facility.

3.3 MIGRATION PATHWAY DISCUSSION

The Sybill facility is not located in either the East Dearborn or Baby Creek Sewer Districts. The facility is in the City of Detroit south of I-75 and north of the Detroit River on South Military. According to Sybill personnel, the City of Detroit has blocked the sewer connection from the facility; therefore, a route into the sewer system does not exist. If the connection to the sewer system was intact, the combined sewage would be conveyed to the Detroit River Interceptor, which conveys flow to the City of Detroit Wastewater Treatment Plant. During wet weather, overflows can occur directly to the Detroit River.

SECTION 4

DISCUSSION OF POTENTIAL THREATS

4.1 FINDINGS OF POTENTIAL THREATS TO HUMAN HEALTH AND THE ENVIRONMENTAL

Paragraph (b) (2) of Part 300.415 of the National Contingency Plan (NCP) lists factors to be considered when determining the appropriateness of a potential removal action at a site. The following discussion presents a summary of those factors applicable to the Sybill site.

- **Actual or potential exposure of nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.**

Field observations made during the site inspections indicate the presence of uncontrolled, potentially hazardous substances at the abandoned Sybill facility. Containers are open and are readily accessible to the nearby population. Based upon labeling, some of the potential hazardous substances may include but are not limited to concentrated sodium hypochlorite, 35% solutions of hydrogen peroxide, and anhydrous sodium hydroxide. START's site inspections revealed trespassers and vandals have gained access to the facility. These persons could readily come into contact with hazardous substances, causing injury or death.

- **Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release.**

The facility has five ASTs on the exterior of the buildings. The current combined volume of these ASTs is estimated to be in excess of 300,000 gallons. Evidence of a recent release of petroleum materials was evident in the secondary containment for ASTs Nos. 1, 2, 3, 4, and 5. The on-site pump house contains both sludge and free oil. In addition, the on-site ASTs do not have locked valves, and there is unrestricted access to the top of the tanks.

The containment around ASTs Nos. 3, 4, and 5 is not continuous (Attachment C, Photo 18). There are pipes through the containment wall that could allow oil to be released from the containment structure to the environment in an uncontrolled manner. The on-site storage tanks have not been inspected, and no reported maintenance has been performed on them since August of 2001. Furthermore, because the facility is abandoned, all SPCC contingencies and precautions to prevent an uncontrolled release of oil and potentially hazardous substances from the site are not present.

- **Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.**

In the secondary containment area, accumulations of rainfall in the spring and summer or snow in the winter could allow a release of oil and hazardous substances to the environment.

- **The availability of other appropriate federal or state response mechanisms to respond to the release.**

As the facility is currently under the scrutiny of U.S. EPA and MDEQ, funding for a removal action is present.

4.2 HAZARD EVALUATION

The facility is abandoned and contains over 300,000 gallons of oil and potentially hazardous substances. The facility has been vandalized and is open to the public for trespass. The buildings contain labeled cylinders of hydrogen, propane, nitrogen, and other potentially hazardous gasses.

In the secondary containment area, START observed breaks and open pipes that have discharged oil to the environment. This uncontrolled discharge of oil to the environment as well as the public's unrestricted access to the hazardous substances on-site constitute an imminent and substantial danger to human health and the environment.

SECTION 5

FINDINGS AND CONCLUSIONS

The U.S. EPA has established three primary criteria for determining if a specific facility may be accountable for the River Rouge oil spill. The criteria consists of the following:

- A positive match on the oil analysis;
- Adequate oil handling volumes (greater than 100,000 gallons);
- A pathway to the suspected release points in the River Rouge.

All samples collected (eight total) from the facility did not match the material released into the River Rouge in April 2002. Though the Sybill facility has sufficient storage volume (1,525,000 gallons), the pathway for combined sewer overflow events discharges into the Detroit River. As a result, Sybill should not be considered as a PRP for the April 2002 release.

Although the site inspection did not lead to Sybill's identification as a PRP, the inspection did, however, identify potential threats to both human health and the environment. Because of these identified potential threats, an expanded site assessment may be warranted to evaluate this potential risk.

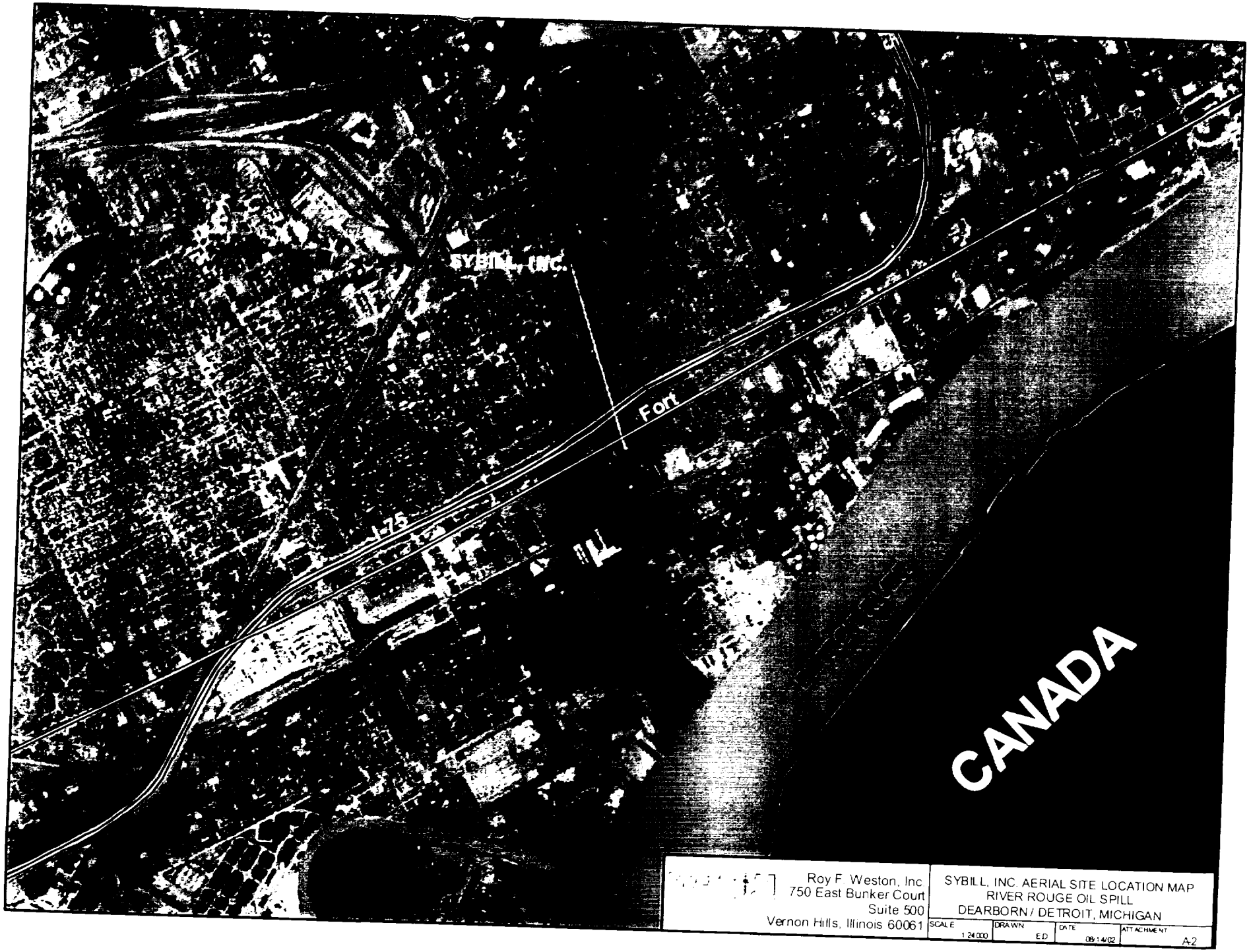
ATTACHMENT A

Site Location Maps

A-1 Topographic Site Location Map

A-2 Aerial Site Location Map

WESTON MANAGERS DESIGNERS/CONSULTANTS	Roy F. Weston, Inc. 750 East Bunker Court Suite 500 Vernon Hills, Illinois 60061	SYBILL, INC., TOPOGRAPHIC SITE LOCATION MAP RIVER ROUGE OIL SPILL DETROIT, MICHIGAN
		DATE: AUGUST 2002 | ATTACHMENT: A-1



Roy F. Weston, Inc
750 East Bunker Court
Suite 500
Vernon Hills, Illinois 60061

SYBILL, INC. AERIAL SITE LOCATION MAP
RIVER ROUGE OIL SPILL
DEARBORN / DETROIT, MICHIGAN

SCALE	DRAWN	DATE	ATTACHMENT
1:24,000	E.D.	09/14/02	A-2

ATTACHMENT B

Facility Layout Map

N

MH

WATER TOWER

LOAD / UNLOAD RACK AREA

TOTES (POLYMERS)

DRUMS (MISC CHEMICALS)

PROCESSING BUILDING

MH

SCALE PIT

MH

FUEL AST

19

CAUSTIC

15

ACID

16

17

25

26

27

28

29

30

20

21

22

23

24

SCRUBBERS

11

12

14

9

3 (CLARIFIER)

18

10

W T

BOILER HOUSE

ASH PIT

4 (INBOUND MATERIAL BUFFER)

5 (CLARIFIER)

OFFICE BUILDING

HUSSAR ROAD

LEGEND

CONTAINMENT WALL

BUILDING STRUCTURE

FENCED PROPERTY LINE

TRUCK TANKER / TRAILER

MILITARY ROAD

CAVALRY ROAD

2 (TREATMENT)

1 (WASTE OIL HOLDING)

PUMP HOUSE

Roy F. Weston, Inc.
750 East Bunker Court
Suite 500
Vernon Hills, Illinois 60061

SYBILL, INC. FACILITY LAYOUT MAP
RIVER ROUGE OIL SPILL
DETROIT, MICHIGAN

SCALE:	DRAWN:	DATE:	ATTACHMENT:
NTS	SAW	AUGUST 2002	B

ATTACHMENT C

Select Photo Documentation

SITE: Sybill, Inc.

DATE: 10 May 2002

PHOTO NO: 4 **DIRECTION:** E

SUBJECT: A view of 250,000-gallon ASTs adjacent to the roadway.

PHOTOGRAPHER: C. Green

SITE: Sybill, Inc.

DATE: 10 May 2002

PHOTO NO: 5 **DIRECTION:** S

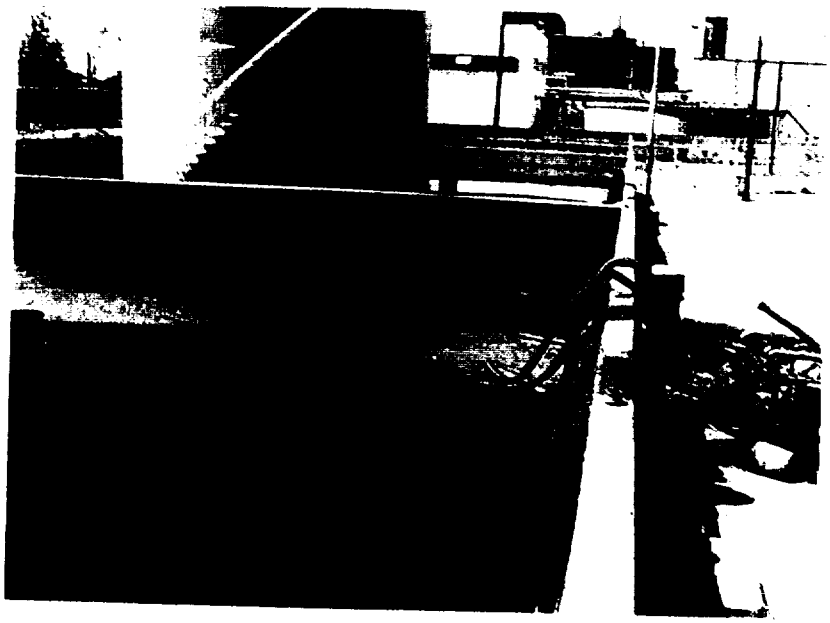
SUBJECT: A view of the Sybill facility - office building to the left, AST Nos. 3 and 4 at center, and the processing building to the right.

PHOTOGRAPHER: C. Green

SITE: Sybill, Inc. **DATE:** 10 May 2002

PHOTO NO: 6 **DIRECTION:** SW **SUBJECT:** A view of the processing building.

PHOTOGRAPHER: C. Green



SITE: Sybill, Inc. **DATE:** 10 May 2002

PHOTO NO: 9 **DIRECTION:** W **SUBJECT:** A view of oil inside the secondary containment around AST No. 1.

PHOTOGRAPHER: C. Green

SITE: Sybill, Inc.

DATE: 10 May 2002

PHOTO NO: 13 **DIRECTION:** Down

SUBJECT: A view of the contents in the east access point of the scale vault.

PHOTOGRAPHER: C. Green

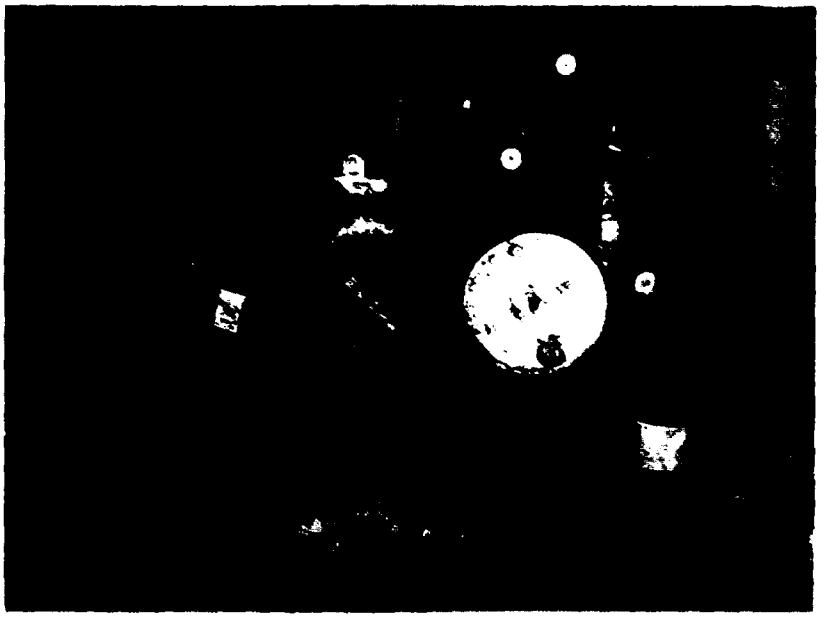
SITE: Sybill, Inc.

DATE: 10 May 2002

PHOTO NO: 14 **DIRECTION:** Down

SUBJECT: A view of oil and water in the scale vault's west access point.

PHOTOGRAPHER: C. Green



SITE: Sybill, Inc. **DATE:** 10 May 2002

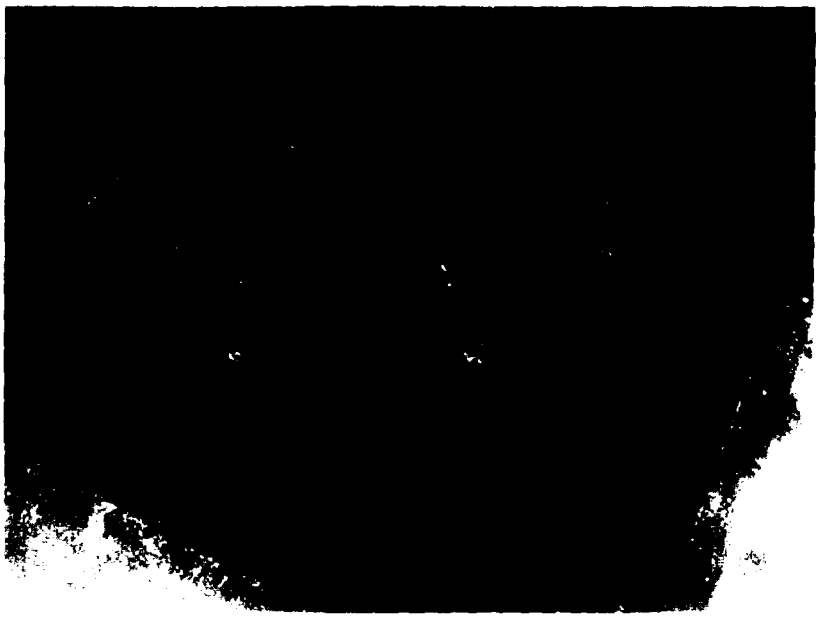
PHOTO NO: 15 **DIRECTION:** NW **SUBJECT:** A view of drums with unknown contents in the process building.

PHOTOGRAPHER: C. Green

SITE: Sybill, Inc. **DATE:** 10 May 2002

PHOTO NO: 16 **DIRECTION:** NW **SUBJECT:** A view of drums with unknown contents in the boiler house next to the ash pit.

PHOTOGRAPHER: C. Green



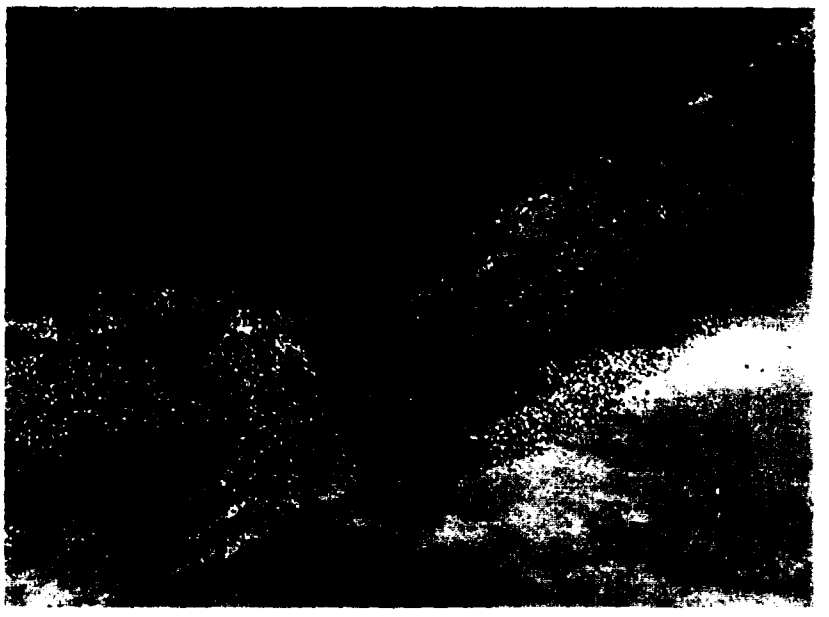
SITE: Sybill, Inc.

DATE: 10 May 2002

PHOTO NO: 17 **DIRECTION:** Down

SUBJECT: A view of the ash pit containing oil in the boiler house.

PHOTOGRAPHER: C. Green



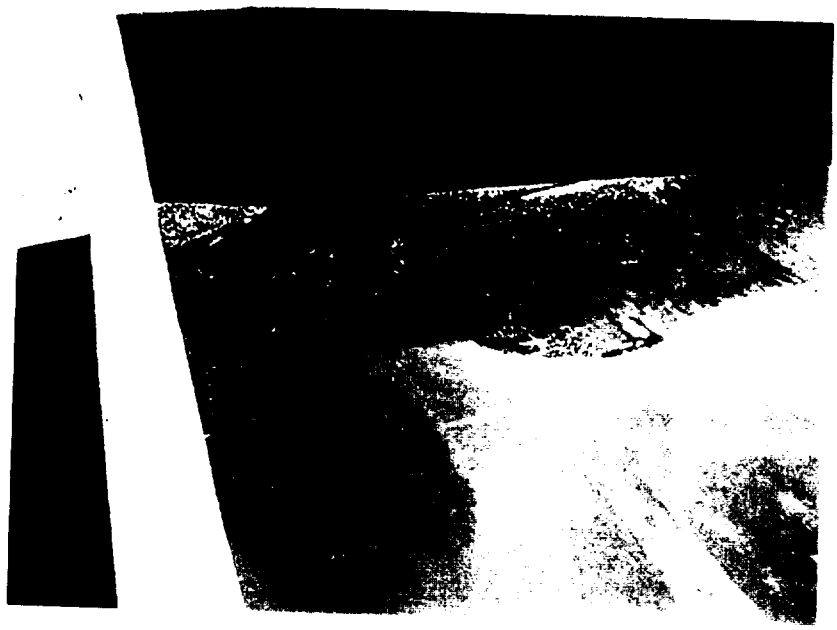
SITE: Sybill, Inc.

DATE: 10 May 2002

PHOTO NO: 18 **DIRECTION:** Down

SUBJECT: A view of a break and leak in the secondary containment around AST Nos. 3, 4, and 5.

PHOTOGRAPHER: C. Green



SITE: Sybill, Inc.

DATE: 10 May 2002

PHOTO NO: 36 **DIRECTION:** Down

SUBJECT: A view of oil in secondary containment around AST No. 2.

PHOTOGRAPHER: C. Green

SITE: Sybill, Inc.

DATE: 10 May 2002

PHOTO NO: 39 **DIRECTION:** Down

SUBJECT: A view of oil in the secondary containment of AST Nos. 3, 4, and 5.

PHOTOGRAPHER: C. Green

SITE: Sybill, Inc. **DATE:** 10 May 2002

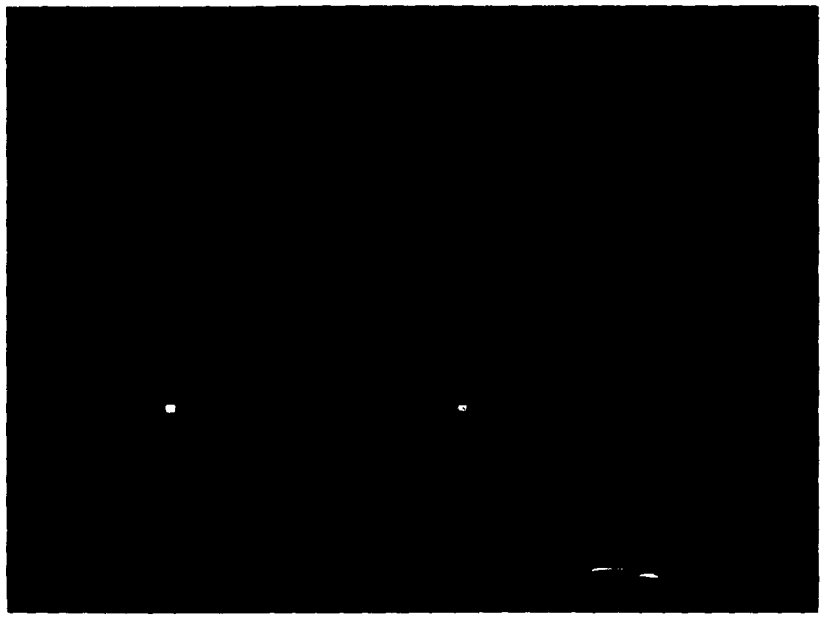
PHOTO NO: 40 **DIRECTION:** Down **SUBJECT:** A view of oil in the secondary containment of AST Nos. 3, 4, and 5.

PHOTOGRAPHER: C. Green

SITE: Sybill, Inc. **DATE:** 10 May 2002

PHOTO NO: 41 **DIRECTION:** S **SUBJECT:** A view of ASTs inside the processing building.

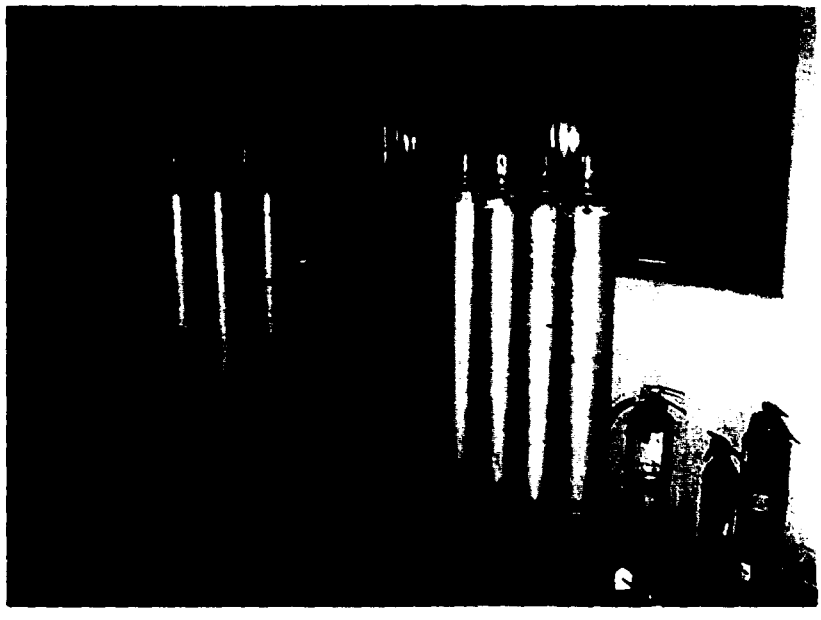
PHOTOGRAPHER: C. Green



SITE: Sybill, Inc. **DATE:** 10 May 2002

PHOTO NO: 42 **DIRECTION:** SE **SUBJECT:** A view of ASTs inside the processing building.

PHOTOGRAPHER: C. Green



SITE: Sybill, Inc. **DATE:** 13 May 2002

PHOTO NO: 48 **DIRECTION:** E **SUBJECT:** A view of gas cylinders in the office building.

PHOTOGRAPHER: T. Borman

SITE: Sybill, Inc. **DATE:** 13 May 2002

PHOTO NO: 49 **DIRECTION:** S **SUBJECT:** A view of material stored in the office building.

PHOTOGRAPHER: T. Borman

SITE: Sybill, Inc. **DATE:** 13 May 2002

PHOTO NO: 53 **DIRECTION:** N **SUBJECT:** A view of the pump house at the northern section of the facility, adjacent to AST Nos. 1 and 2.

PHOTOGRAPHER: C. Green

SITE: Sybill, Inc. **DATE:** 13 May 2002

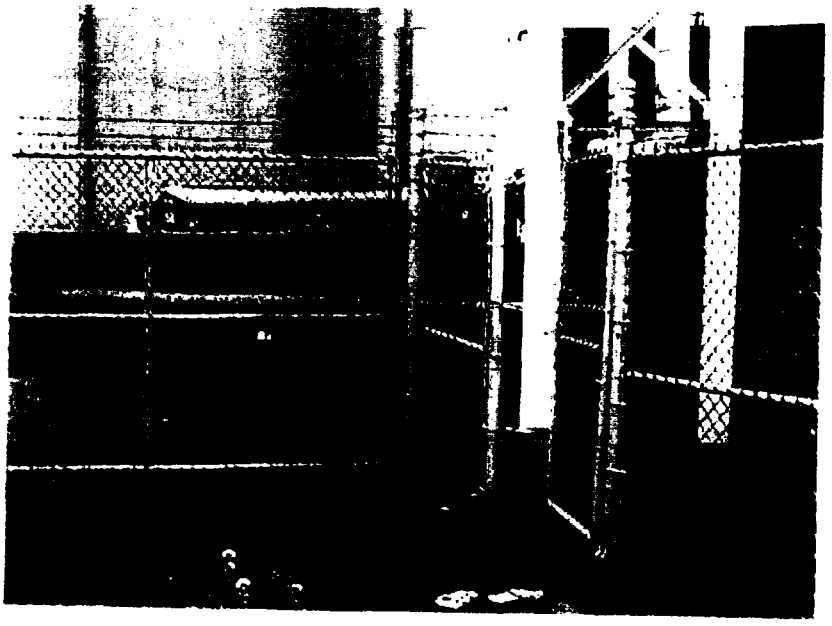
PHOTO NO: 54 **DIRECTION:** Down **SUBJECT:** A view of a sump in the pump house.

PHOTOGRAPHER: T. Borman

SITE: Sybill, Inc. **DATE:** 13 May 2002

PHOTO NO: 55 **DIRECTION:** Down **SUBJECT:** A view of accumulated sludge in the pump house.

PHOTOGRAPHER: T. Borman



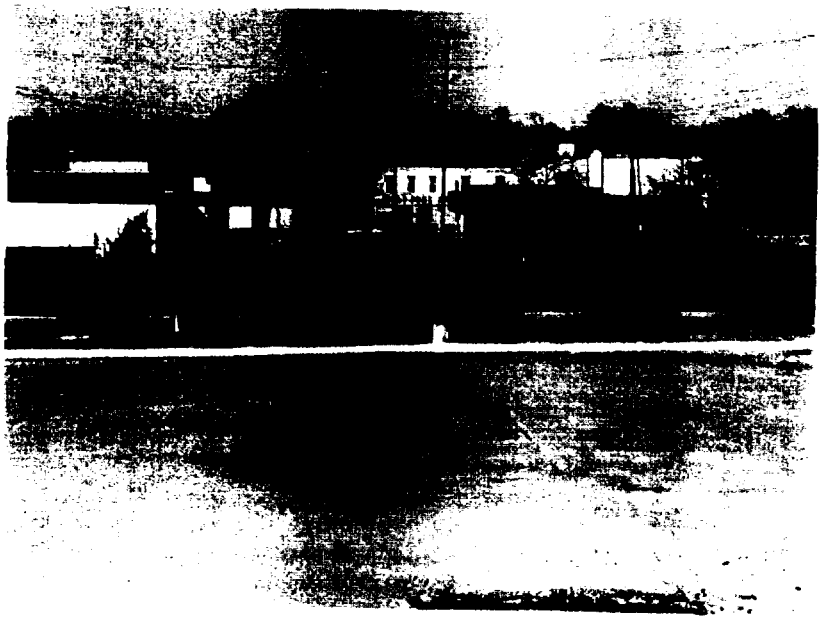
SITE: Sybill, Inc.

DATE: 13 May 2002

PHOTO NO: 58 **DIRECTION:** E

SUBJECT: A view of an unsecured gate adjacent to the pump house.

PHOTOGRAPHER: T. Borman



SITE: Sybill, Inc.

DATE: 13 May 2002

PHOTO NO: 66 **DIRECTION:** N

SUBJECT: A view of the tanker trailer spill pad.

PHOTOGRAPHER: USCG

SITE: Sybill, Inc. **DATE:** 13 May 2002

PHOTO NO: 68 **DIRECTION:** NW **SUBJECT:** A view of an unsecured gated entrance to the southern portion of the property.

PHOTOGRAPHER: T. Borman

SITE: Sybill, Inc. **DATE:** 13 May 2002

PHOTO NO: 70 **DIRECTION:** Down **SUBJECT:** A view of a manhole to sump in the north parking lot.

PHOTOGRAPHER: T. Borman

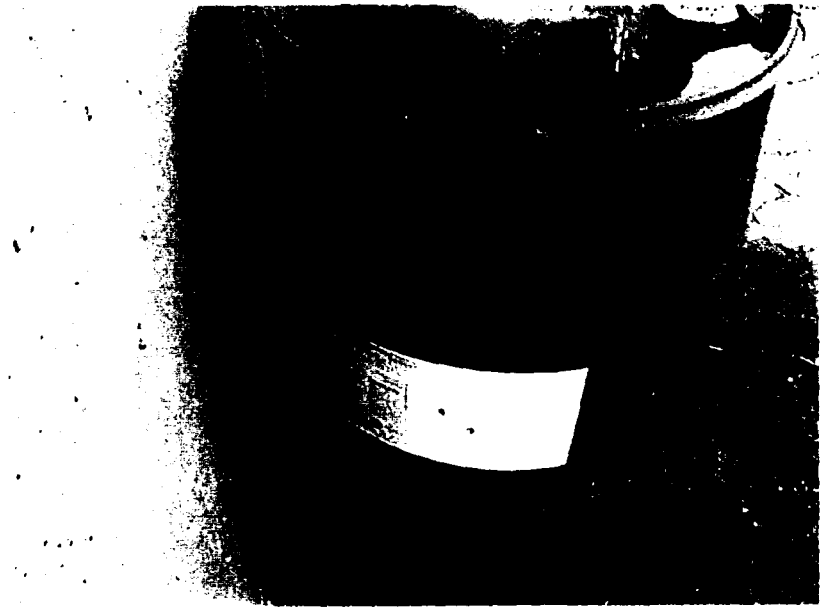
SITE: Sybill, Inc.

DATE: 13 May 2002

PHOTO NO: 81 **DIRECTION:** S

SUBJECT: A view of various unsecured supplies located in the office building.

PHOTOGRAPHER: T. Borman



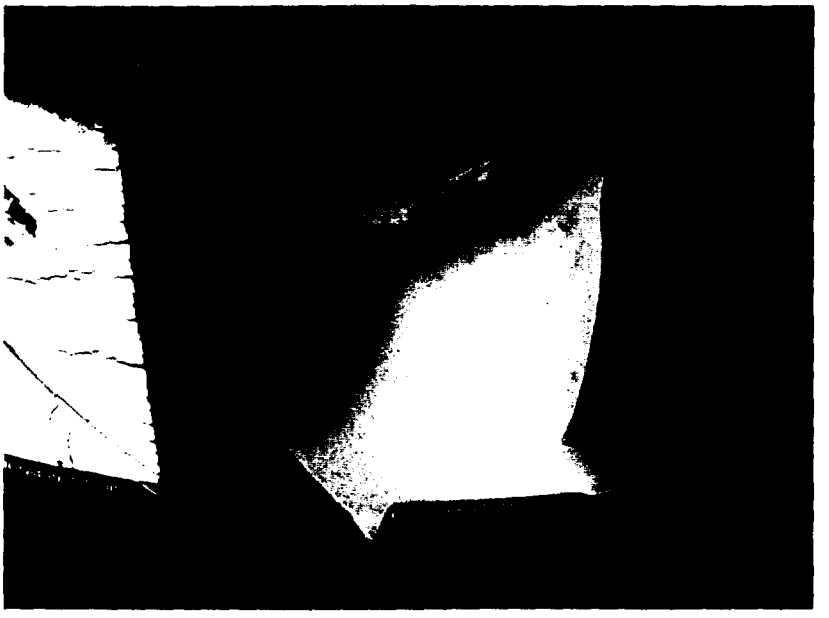
SITE: Sybill, Inc.

DATE: 13 May 2002

PHOTO NO: 84 **DIRECTION:** Down

SUBJECT: A view of a 55-gallon drum outside of the secondary containment around AST No. 2.

PHOTOGRAPHER: T. Borman



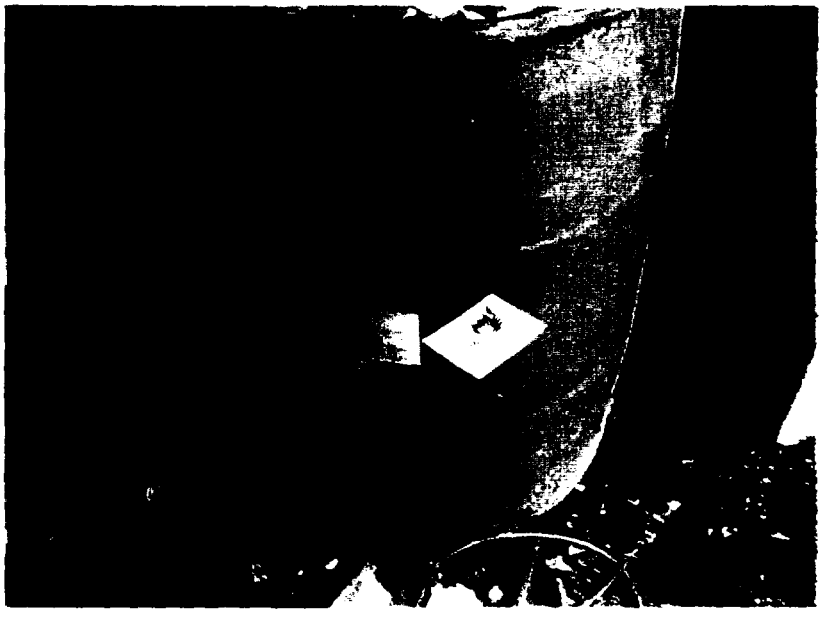
SITE: Sybill, Inc.

DATE: 13 May 2002

PHOTO NO: 85 **DIRECTION:** E

SUBJECT: A view of a 55-gallon blue poly drum located outside the secondary containment for AST No. 2.

PHOTOGRAPHER: T. Borman



SITE: Sybill, Inc.

DATE: 13 May 2002

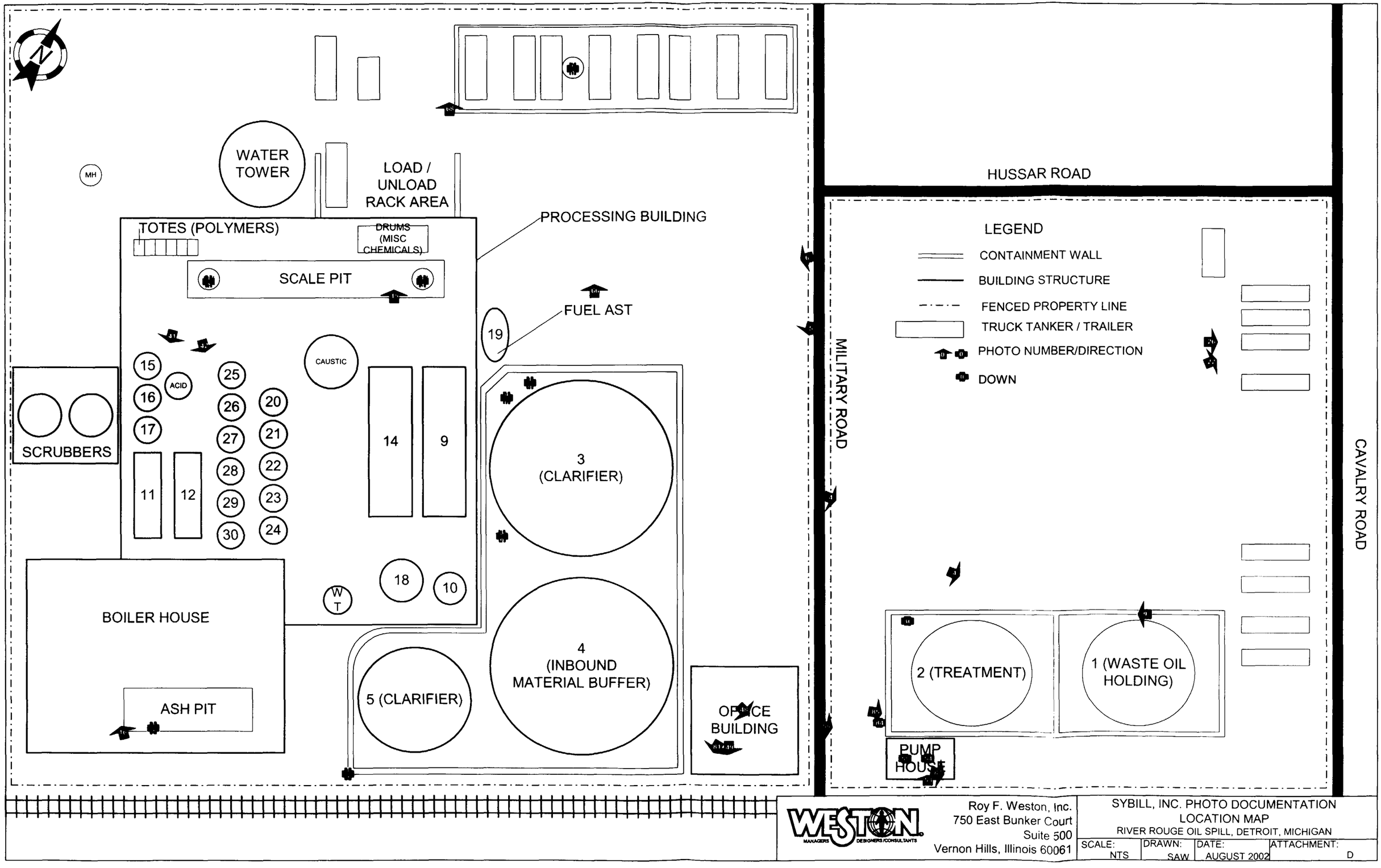
PHOTO NO: 87 **DIRECTION:** E

SUBJECT: A view of a 55-gallon blue poly drum located inside the pump house.

PHOTOGRAPHER: T. Borman

ATTACHMENT D

Select Photo Documentation Location Map



WESTON MANAGERS DESIGNERS/CONSULTANTS

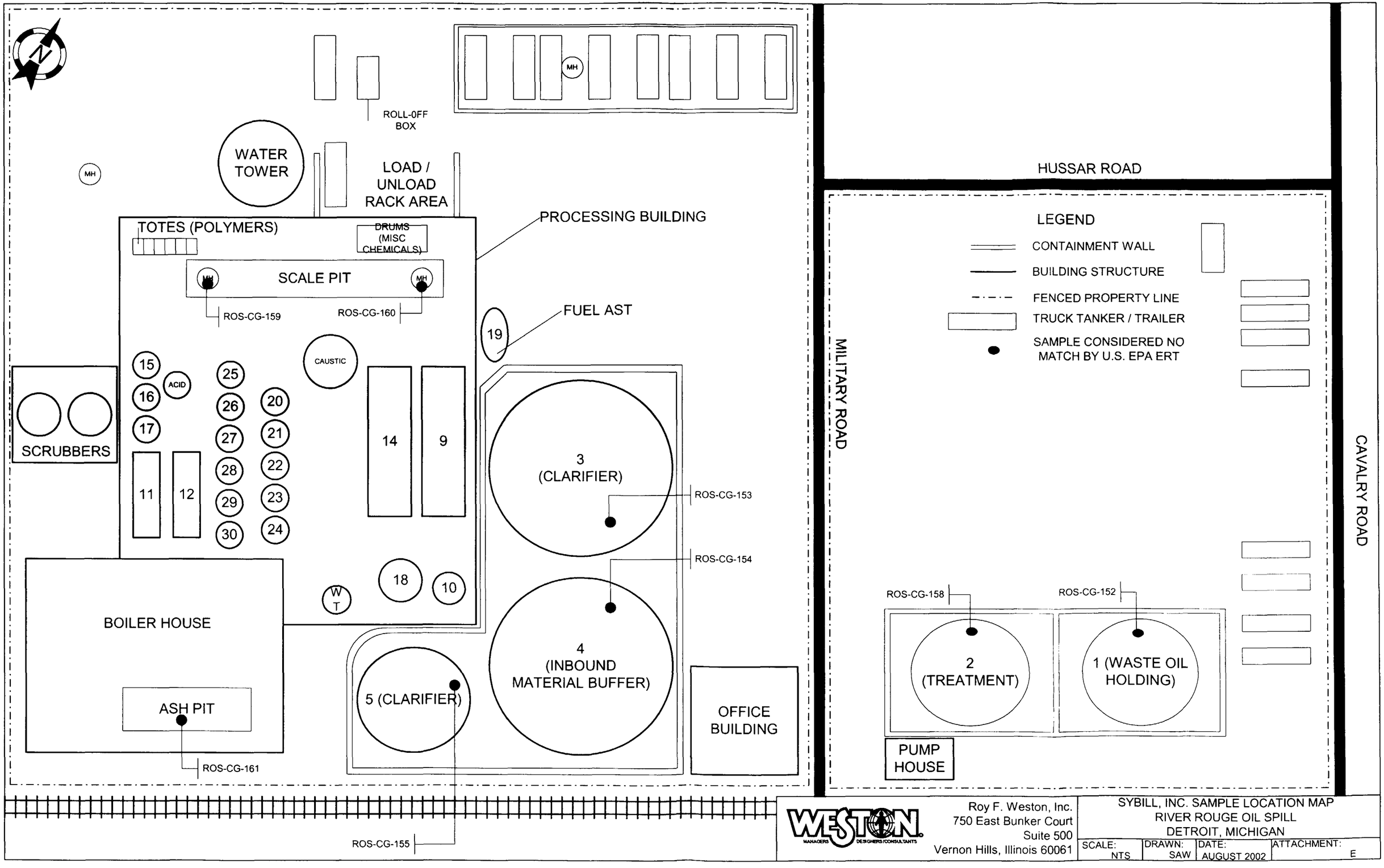
Roy F. Weston, Inc.
750 East Bunker Court
Suite 500
Vernon Hills, Illinois 60061

SYBILL, INC. PHOTO DOCUMENTATION
LOCATION MAP
RIVER ROUGE OIL SPILL, DETROIT, MICHIGAN

SCALE:	DRAWN:	DATE:	ATTACHMENT:
NTS	SAW	AUGUST 2002	D

ATTACHMENT E

Sample Location Map



Roy F. Weston, Inc.
750 East Bunker Court
Suite 500
Vernon Hills, Illinois 60061

SYBILL, INC. SAMPLE LOCATION MAP
RIVER ROUGE OIL SPILL
DETROIT, MICHIGAN

SCALE:	DRAWN:	DATE:	ATTACHMENT:
NTS	SAW	AUGUST 2002	E

ATTACHMENT F

Sample Results Table for Sybill, Inc.

Attachment F Sample Results Table for Sybill, Inc.			
START Sample Number	**Date**	**Result**	**Sample Location**
ROS-CG-152	5/10/02	No Match	AST No. 1
ROS-CG-153	5/10/02	No Match	AST No. 3
ROS-CG-154	5/10/02	No Match	AST No. 4
ROS-CG-155	5/10/02	No Match	AST No. 5
ROS-CG-158	5/13/02	No Match	AST No. 2
ROS-CG-159	5/13/02	No Match	East manhole on weigh station vault
ROS-CG-160	5/13/02	No Match	West manhole on weigh station vault
ROS-CG-161	5/13/02	No Match	Ash pit sump under coal incinerator